

THE ROSEN LAW FIRM, P.A.

Laurence M. Rosen
One Gateway Center, Suite 2600
Newark, NJ 07102
Telephone: (973) 313-1887
Fax: (973) 833-0399
lrosen@rosenlegal.com

Lead Counsel for Plaintiffs and the Putative Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHARLES DAVIS, BART PANESSA, and JEFF
NIEMEIER, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

KATANGA MINING LIMITED, JOHNNY
BLIZZARD, JACQUES LUBBE, MATTHEW
COLWILL, ARISTOTELIS MISTAKIDIS,
LIAM GALLAGHER, TIM HENDERSON,
IVAN GLASENBERG, AND GLENCORE PLC,

Defendants.

Case No. 2:17-cv-12188-CCC-JBC

CLASS ACTION

Hearing Date: June 25, 2021

Hon. Claire C. Cecchi

**LEAD COUNSEL'S MOTION FOR AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND AWARD TO PLAINTIFFS**

PLEASE TAKE NOTICE that pursuant to the Order Granting Motion for Preliminary Approval of Class Action Settlement (the "Preliminary Approval Order") (ECF No. 90), on June 25, 2021 at 9:30 a.m., or as soon thereafter as they may be heard, The Rosen Law Firm, P.A. ("Lead Counsel") will move this Court, the Honorable Claire C. Cecchi, United States District Judge of the United States District Court for the District of New Jersey, 50 Walnut Street, Courtroom MLK 5B, Newark, New Jersey, 07102, for entry of an Order: (1) awarding attorneys'

fees, (2) awarding reimbursement of litigation expenses, and (3) approving a compensatory award to Plaintiffs.

In support of this motion, Plaintiffs rely upon the accompanying Memorandum of Law, the Stipulation and Agreement of Settlement and exhibits thereto (ECF Nos. 87, 87-1, 87-2, 87-3, 87-4, 87-5, 87-6, and 87-7), the Declaration of Laurence Rosen in support of the motion and exhibits thereto, and all prior pleadings and proceedings.

Dated: May 28, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

Laurence M. Rosen
One Gateway Center, Suite 2600
Newark, NJ 07102
Telephone: (973) 313-1887
Facsimile: (973) 833-0399
E-mail: lrosen@rosenlegal.com

Brent J. LaPointe (*pro hac vice*)
275 Madison Avenue, 40th Floor
New York, NY 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827
E-mail: blapointe@rosenlegal.com

Lead Counsel for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on this on May 28, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen
Laurence M. Rosen